

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

MARY MADISON

Plaintiff,

CREATIVE WERKS, LLC, and  
STEVE SCHROEDER,

Defendant.

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Case No. 23CV16476

Hon. Judge Elaine E. Bucklo

**MOTION TO SET ASIDE AND FOR LEAVE TO FILE**

**GROUP EXHIBIT A**

**From:** [Jon D. Cohen](#)  
**To:** [Jordan Hoffman](#)  
**Cc:** [Joseph R. Delehanty](#)  
**Subject:** Re: EXTERNAL: RE: Creative Werks/Madison/  
**Date:** Saturday, December 30, 2023 9:41:18 AM

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Jordan, this email is to confirm our telephone conversation yesterday where in it was agreed that Creative Werks could have an additional 20 days to answer or otherwise plead with respect to the federal complaint filed by Ms. Jackson in the northern District of Illinois. Thank you and your client for this courtesy.

Sent from my iPhone

On Dec 15, 2023, at 8:30 AM, Jordan Hoffman <[jthoffmanlaw@gmail.com](mailto:jthoffmanlaw@gmail.com)> wrote:

Good morning, Jon. I think those dates may be possible. But, it looks like the 19th is a Friday and the 22nd is a Monday. I will look to firm up Ms. Madison's availability.

Respectfully yours,

Jordan Hoffman  
The Law Office of  
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On Tue, Dec 12, 2023 at 12:18 PM Jon D. Cohen <[JCohen@dickinson-wright.com](mailto:JCohen@dickinson-wright.com)> wrote:

**From:** [Jordan Hoffman](#)  
**To:** [Jon D. Cohen](#)  
**Subject:** EXTERNAL: Re: Madison Federal Complaint Extension  
**Date:** Tuesday, January 23, 2024 3:38:46 PM

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You're welcome, Jon, thank you.

The Law Office of  
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On Tue, Jan 23, 2024 at 1:02 PM Jon D. Cohen <[JCohen@dickinson-wright.com](mailto:JCohen@dickinson-wright.com)> wrote:

Jordan, thank you for the additional two (2) week extension to answer or otherwise plead with respect to Case No. 23CV16476 (until 2/8/24).

Hopefully, our settlement negotiations will obviate the need for it to be addressed substantively. Also hope your ankle heals quickly.

**Jon D. Cohen Member**

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Suite 1200  
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**DICKINSON WRIGHT** PLLC

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NEVADA OHIO TENNESSEE TEXAS WASHINGTON D.C. TORONTO

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